IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

Plaintiff,

CIVIL NO. 12-2039 (GAG)

v.

COMMONWEALTH OF PUERTO RICO, et al.,

Defendants.

SECOND MOTION FOR EXTENSION OF TIME TO FILE MOTION IN COMPLIANCE WITH ORDER AT DOCKET NO. 1134

TO THE HONORABLE COURT:

COMES NOW Defendants, Commonwealth of Puerto Rico and Puerto Rico Police Department ("Defendants" and/or "PRPB"), by and through the undersigned counsel, and respectfully inform the Court as follows:

- On March 4, 2019, the Court ordered the parties and the Technical Compliance Advisor
 ("TCA") "to meet and to report to the Court no later than March 20, 2019, an effective plan
 of action geared to resolving" alleged deficiencies in the PRPB's information technology
 systems. Docket No. 1134.
- 2. On March 20, 2019, the PRPB, with the consent of the United States of America ("USA") and the TCA, requested a brief extension of time, until March 25, 2019, to comply with the Court's order. On March 21, 2019, the Court granted the PRPB's motion as requested. Docket No. 1160.
- 3. This morning, during a meeting between the Court, the parties and the TCA, counsel for the PRPB advised the Court that the PRPB would be moving for an additional brief

extension of time to comply with the Court's March 4th order, as the PRPB had scheduled

a meeting with high-ranking members of the PRPB to discuss, among other matters, the

status of the PRPB's information technology systems and projects related to the Police

Reform, in order to be able to prepare the report requested by the Court.

4. Neither the USA nor the TCA expressed objections to the PRPB's request.

5. Accordingly, the PRPB hereby requests a brief extension of time, until Monday, April 1,

2019, to afford the PRPB the opportunity to finalize its evaluation of the status of the

information technology systems, share with the USA and the TCA a full and complete

status report on the progress the PRPB has made in implementing its information

technology projects, and file the report as requested by the Court.

6. This request is made in good faith and is not meant to delay these proceedings.

WHEREFORE, Defendants respectfully request the Court to GRANT this motion and

afford the PRPB an additional extension of time until April 1, 2019, to comply with its Order

(Docket No. 1134), with any additional relief it deems just and proper.

RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY: That today we have electronically filed the foregoing

document with the Clerk of the Court for the District of Puerto Rico, using the CM/ECF system

which will send a copy and notification of filing to all counsel of record.

In San Juan, Puerto Rico, this 25th day of March, 2019.

By:

s/ Maria A. Dominguez

Maria A. Dominguez USDC-PR No. 210908

madt@mcvpr.com

2

s/ Arturo J. Garcia Sola Arturo J. Garcia Sola USDC-PR No. 201903 ajg@mcvpr.com

s/ Javier Micheo Marcial
Javier F. Micheo Marcial
USDC-PR No. 305310
jfmm@mcvpr.com

McCONNELL VALDÉS LLC PO Box 364225 San Juan, PR 00936-4225 Telephone (787) 250-5641 Fax: (787) 759-8282